

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

Case No. 05-41122-RJK
Chapter 7

Daniel C. Bauer and
Laurie A. Bauer,

Debtors.

Randall L. Seaver, Trustee,

Plaintiff,

Adv. No. 05-4149-RJK

vs.

Daniel C. Bauer and Laurie A. Bauer,

Defendants.

**JOINT ANSWER OF DEFENDANTS
DANIEL C. BAUER AND LAURIE A. BAUER**

Defendants Daniel C. Bauer and Laurie A. Bauer, for their answer to the Trustee's Complaint states and alleges as follows. Except as expressly admitted, qualified or explained, Defendants deny each and every allegation, matter and thing in Trustee's Complaint.

1. Answering numbered paragraph 1, Defendants admit the allegations.
2. Answering numbered paragraph 2, Defendants admit that Trustee has commenced this action seeking a denial of discharge, but denies that Trustee is entitled to such relief.
3. Answering numbered paragraph 3, Defendants admit the allegations.
4. Answering numbered paragraph 4, Defendants admit the allegations.
5. Answering numbered paragraph 5, Defendants admit the allegations.

6. Answering numbered paragraph 6, Defendants admit that the transfers of the items identified in paragraph 6 a. i through 6iv and the payment identified in paragraph 6.b. are not identified on the Statement of Financial Affairs, affirmatively assert in connection therewith that these transfers were voluntarily disclosed by the Defendants at the first meeting of creditors, and deny the remaining allegations. Defendants admit that the transfers were filed by the transferee in December, 2004.

7. Answering numbered paragraph 7, Defendants deny the allegations.

AFFIRMATIVE DEFENSES

For their affirmative defenses, Defendants state and allege as follows:

1. The transfers of the items in paragraph 6.a.i through 6.a.iv. were made for adequate value.
2. The payment to the attorney referenced in paragraph 6b. was an ordinary and necessary expense of Debtors' minor child.

WHEREFORE, Defendants respectfully request that the Trustee take nothing under his Complaint and that the Debtors be granted a discharge.

Dated: August 1, 2005

LAPP, LIBRA, THOMSON,
STOEBNER & PUSCH, CHARTERED

/e/ Ralph V. Mitchell
Ralph V. Mitchell (#184639)
One Financial Plaza, Suite 2500
120 South Sixth Street
Minneapolis, MN 55402
(612) 338-5815
ATTORNEYS FOR DEFENDANTS

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Defendants.

UNSWORN CERTIFICATE OF SERVICE

I, Alison N. Megard, declare under penalty of perjury that on August 1, 2005, I mailed copies of the attached Joint Answer of Defendants Daniel C. Bauer and Laurie A. Bauer by first class mail postage prepaid to each entity named below at the address stated below for each entity:

Randall L. Seaver
12400 Portland Avenue South
Suite 132
Burnsville, MN 55337

U.S. Trustee
1015 U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415

Executed on: August 1, 2005

/e/ Alison N. Megard
Alison N. Megard, Legal Secretary
Lapp, Libra, Thomson, Stoeber &
Pusch, Chartered
120 South Sixth Street, Suite 2500
Minneapolis, MN 55402
612/338-5815